

From: [Moore, Gary](#)
To: [Crawford, Beth](#)
Cc: [Cassidey, LeRoy](#); [Bernier, Roberto](#)
Subject: Re: NT7/NT8/ST1/ST6
Date: Thursday, February 05, 2015 8:16:32 PM

Beth:

I am still considering what to do on both ST1/ST6 and FT1004. My big problem is that I need to get TCEQ spending its money on transporation and disposal because we can't use their money to replace any of our labor. They have to pay for Transportation and Disposal.

ST1/ST6: The elevated mercury appears to be in the sludge portion of the analytical. Although it did not leach to result in a TCLP hit for mercury. Can we not find a stainless steel vacuum truck?

FT1004: Paying for this will cut into my labor to complete so I am hesitant to do this without TCEQ picking this up.

NT8: What options are we looking at for this? Is it just incineration? If so, we just need to know how we are going to ship it. I will probably need to go in vac boxes (probably our safest bet)

This is what I am thinking:

1. TCEQ pays for the following:

- a. Disposal of All/Most Wastes in Vacuum Boxes**
- b. Rental on All Vacuum Boxes for Day of Shipment offsite**
- c. Disposal of All/Most Wastes in Roll-off Boxes**
- d. All Totes/Drum Wastes**
- e. Maybe Additional Stuff**

Thanks,

Gary Moore

Federal On-Scene Coordinator

U.S. EPA Region 6

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From: Crawford, Beth

Sent: Thursday, February 5, 2015 2:50 PM

To: Moore, Gary

Cc: Cassidey, LeRoy; Bernier, Roberto

Subject: RE: NT7/NT8/ST1/ST6

Gary,

See responses below:

NT7: We got the proposal from Lonestar last week on NT7. I would like to get this one gone.

LeRoy has this scheduled to start on Monday 2/9/15

NT8: We need a home for NT8. So far it looks like it may have too many solids for Lonestar.

We may have some volume that could go to Lonestar if we can figure out how to separate it. **I spoke with Veolia again today on this he was waiting for approvals to get back to him. I asked him to get back to me before the end of the day. I will keep you posted.**

ST1/ST6: As we talked yesterday, we have a home for this stream but it will likely take too long for the TCEQ portion to get done for this so we probably need to handle. Therefore, we

need to move forward on this. Give me the estimated price on this so we can move forward. We need to have some type of filter. We have good news and bad news with this stream. Amandeep was able to get Clean Harbors on TCEQ's approved list so that was a step in the right direction in case we want to run this under the commercial side versus federal. He is continuing to move forward with finalizing required documents on his side. However, we are running into a bit of a snag here with transportation. Clean Harbors has not been able to source a vac truck company that is willing to put this material into their tanker. They have a subcontractor that has fiberglass lined trucks however there was 91.9 mg/kg of mercury in this stream and the subcontractor is stating the mercury level is too high they don't want to take the chance of having mercury lingering in their trucks. They also want to know the concentration of the acid. I am working with Guy in our office trying to see what we can come up with on working through this. I have also asked Clean Harbors to give us a price on this material if it were to ship in totes. I know this isn't the route we want to take but I wanted the pricing in case we have to look into going that direction. I have also contacted another packaging company to see if they have any other suggestions. I will keep on this one as I know it's important just wanted you to understand what I am up against at the moment. Other than that I think FT1004 is ready to go on the federal side. Maybe we can swap FT1004 and ST1,6 putting FT1004 on our side and South Tank 1 and 6 on the commercial side since it is taking a bit to get this figured out. Food for thought anyhow. Call or email me if we need to chat. I expect analytical on sludge boxes and/or roll-offs tomorrow or Monday. We will keep those at the top of the list as well as far as priority. Hope you are enjoying your time off.

Thanks,



Beth Crawford

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From: Moore, Gary [mailto:Moore.Gary@epa.gov]

Sent: Tuesday, February 03, 2015 8:38 AM

To: Crawford, Beth

Subject: CES: NT7/NT8/ST1/ST6

Beth:

We need to get these going immediately. We have to get the materials out of the tanks.

NT7: We got the proposal from Lonestar last week on NT7. I would like to get this one gone.

NT8: We need a home for NT8. So far it looks like it may have too many solids for Lonestar. We may have some volume that could go to Lonestar if we can figure out how to separate it.

ST1/ST6: As we talked yesterday, we have a home for this stream but it will likely take too long for the TCEQ portion to get done for this so we probably need to handle.

Therefore, we need to move forward on this. Give me the estimated price on this so we can move forward. We need to have some type of filter.

Thanks

Gary Moore

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